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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X	
YEHUDA SIGALIT,	:
	:
Plaintiff,	:
	:
-against-	:
	:
JOSSEF KAHLON,	:
	:
Defendant.	:
-----X	

21 Civ. _____

COMPLAINT

JURY TRIAL DEMANDED

Plaintiff Yehuda Sigalit (“Plaintiff” or “Sigalit”), for her Complaint against Defendant Jossef Kahlon (“Kahlon”), states as follows:

NATURE OF THE ACTION

1. Plaintiff, a fifty (50%) percent member of TJ Management Group, LLC (the “Company”) brings this action seeking an equitable accounting against Defendant, her co-member and also a fifty (50%) percent owner of the Company. Specifically, Sigalit demands that Kahlon provide a verified statement of account of Kahlon’s dealings with the Company and its property and earnings during the period November 15, 2004 to date the demanded accounting is furnished, including, but not limited to, the Company’s: (1) assets; (2) income, receipts and revenue received or accrued; (3) expenses paid or incurred; (4) distributions, dividends, salary, compensation or other monies taken or received by Kahlon (or by anyone at his direction); and, (5) all payments by the Company to third parties for services rendered to, or benefits received by,

Kahlon (or to anyone at his direction), Sigalit further requests that, following such accounting, the Court adjudicate any objections, adjust the parties' capital accounts, and enter final judgment in her favor in one half the amount (subject to adjustments) of Kahlon's unauthorized or unmatched distributions, property and other assets, or of the value of benefits, received, accrued or taken by him.

THE PARTIES

2. Plaintiff Yehuda Sigalit is an individual and citizen of the State of Israel.
3. Jossef Kahlon is an individual and citizen of the State of New York.

JURISDICTION AND VENUE

4. This Court has subject matter jurisdiction over case pursuant to 28 U.S.C. § 1332(a), (a)(2) because this matter is between citizens of a State and of a foreign state and the amount in controversy exceeds \$75,000, exclusive of interest and costs.

5. Venue is proper pursuant to 28 U.S.C. § 1391(b)(2) in that this is the judicial district in which a substantial part of the events or omissions giving rise to the claims occurred.

FACTS APPLICABLE TO RELIEF REQUESTED

6. By written assignment, dated November 14, 2004 (the "Assignment"), Kahlon, then the sole member of the Company, caused it to transfer to Sigalit, a fifty percent (50%) membership interest in the Company. A copy of the Assignment is attached hereto as Exhibit A.

7. In or about 2007, the Company acquired title to a parcel of land in Dallas Texas, known as 3450 E. Ledbetter Dr., Dallas Texas (the "Property").

8. The parties agreed the Property would be held for development. Following the Company's acquisition of the Property, it invested approximately \$800,000 toward its development.

9. About eighteen months ago, Sigalit learned Kahlon had sold the Property to Project Verte, Inc.

10. On information and belief, Kahlon, through his corporation TNJ Holdings, Inc., received for the Property consideration in the amount of ten million (\$10,000,000.00) dollars.

11. At no time has Kahlon distributed to Sigalit her fifty percent (or any) share of the net proceeds of the sale of the Property, nor accounted to her regarding the transaction, despite her written demand for an accounting, dated April 29, 2021.

FIRST CLAIM FOR RELIEF

(Equitable Accounting Under New York State Law)

12. Plaintiff repeats and realleges paragraphs 1 through 11 as if fully set forth herein.

13. As co-members of the Company, Sigalit and Kahlon were and remain in a confidential or fiduciary relationship, each owing the other duties of loyalty, confidentiality and trust respecting all matters involving or affecting the Company and its assets, in which both have equal interests.

14. At all relevant times, Kahlon has managed all bank transactions, finance activities, tax matters and otherwise been primarily in control of the Company and its assets, including the Property.

15. By reasons of Kahlon's sale of the Property to Project Verte and the parties' relationship as co-members of the Company, Sigalit is entitled to a verified accounting from Kahlon to include a verified statement of account of his dealings with the Company and its property and earnings as set forth in above paragraph one including, without limitation, the net proceeds of the Company's sale of the Property to Project Verte, Inc. Following such accounting, Sigalit is entitled to an order adjudicating her objections thereto and to final judgment in her favor in the

amount of one half of Kahlon's unauthorized or unmatched distributions, receipt of property or other assets, and the value of benefits received or accrued by him.

16. Sigalit is without an adequate remedy at law.

WHEREFORE, Plaintiff demands judgment against Defendant directing him to account to her respecting TJ Management Group, LLC and its property and awarding her such other and further related relief as may be just and proper, together with interest and her costs and disbursements of this action.

Dated: October 30, 2021

GORDON & HAFFNER, LLP
Attorneys for Plaintiff

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EXHIBIT A

**ASSIGNMENT
OF
MEMBERSHIP INTEREST**

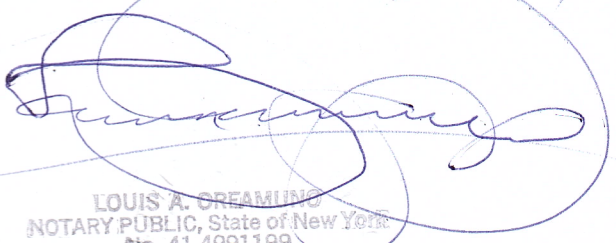
FOR VALUABLE CONSIDERATION, the receipt and sufficiency is hereby acknowledged, **JOSSEF KAHLON**, residing at 8 Lawson Lane, Great Neck, New York 11023 ("KAHLON"), the sole member of **T J MANAGEMENT GROUP, LLC**, a New York limited liability company (the "Company"), hereby sells, assigns, transfers and delivers to **YEHUDA SIGALIT**, residing at Levi Eschol 88, Telaviv, Israel ("SIGALIT"), a fifty percent (50%) Membership Interest in the Company, effective as of the date hereof, excluding any interest in undistributed profits and losses, if any, prior to the date hereof.

DATED: 11-15-04, 2004



JOSSEF KAHLON

*Sworn before me
on 8/DECEMBER, 2004*



LOUIS A. OREAMUNO
NOTARY PUBLIC, State of New York
No. 41-4991199
Qualified in Queens County
Commission Expires Jan. 27, 2007 **G**